

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff

vs.

Crim. No. 19-155 (DRD)

HECTOR SANCHEZ-MORALES

Defendant

**MOTION SUPPLEMENTING REPLY TO GOVERNMENT'S OPPOSITION
TO REQUEST FOR INFORMATION**

TO THE HONORABLE COURT:

Comes now defendant, through the undersigned counsel, and respectfully states and prays:

1. On April 23, 2019 defendant replied to the government's opposition to his request for the name of the individual identified as "A.G." in the indictment. Docket No. 34. Among the arguments put forward by the government in its opposition to defendant's request was that the Report of Investigation memorializing Mr. Sánchez' use of the name "Maria" when addressing "A.G." referred to in Mr. Sánchez' motion was not reliable. According to the prosecution the reference was untrustworthy and self-serving.

2. In his reply, defendant called the court's attention to the fact that the ROI sought to memorialize "A.G.'s" statements, not the defendant's, and that the government had avoided admitting or denying whether "A.G." used the name "Maria." If she did, her actual name would provide grounds for impeachment and was subject to discovery under *Brady v. Maryland*, 373 U.S. 83 (1963).

3. Subsequent to the filing of defendant's reply the undersigned reviewed additional discovery provided by the government and became aware that, according to other Reports of Investigation, "A.G." was known to the persons who retrieved her from Añasco, P.R., as "Mary." Copies of the ROI will be submitted to the court separately under restriction. Thus, the government's discovery corroborates that "A.G." is likely to have used the name "Maria" in her interactions with the defendant and further supports the release of her actual name to the defense.

WHEREFORE, it is respectfully requested that this Honorable Court deem defendant's reply at Docket No. 34 to be supplemented with the information set forth above.

I CERTIFY that this motion has been filed using the court's CM/ECF system which will automatically give notice of the filing to all parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of April 2019.

ERIC A. VOS, Esq.

Federal Public Defender

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